INTERPRETIVE MEMORANDUM 2006-03

To: Licensed Architects

Licensed Engineers

Licensed Locksmiths

Licensed Burglar Alarm Contractors

Arkansas, Louisiana and Texas Locksmith Association

Louisiana Life Safety and Security Association

Louisiana Automatic Fire Alarm Association

Licensed Fire Alarm Contractors

Felicia Cooper, Deputy State Fire Marshal Administrator

Stephen Gogreve, Manager of Inspections Boyd Petty, Manager Licensing Section Pat Aronstein, Manager of Inspections

Plan Review Staff

From: Henry H. Fry, Deputy Assistant Secretary

Date: March 8, 2006

Re: SPECIAL LOCKING ARRANGEMENTS REQUEST FOR INSTALLATION

NOTE: This Memorandum replaces MEMORANDUM 2000-9 dated May 17, 2000.

This memo is intended to clarify the requirements for submittals to this office for proposed special locking system installations. Please note that only the following special locking system types are permitted:

1) Delayed-Egress Locks

Delayed-Egress Locking systems, where permitted by the applicable occupancy chapter, must comply with ALL applicable requirements of NFPA 101.

2) Access-Controlled Egress Doors

Access-Controlled Egress Door systems, where permitted by the applicable occupancy chapter, must comply with ALL applicable requirements of NFPA 101. (See also "Interpretive Memorandum 2006-04" dated March 8, 2006 for additional clarifications).

3) Special Locking Arrangements in Healthcare Occupancies

These locking systems must comply with ALL requirements outlined in this office's "**Interpretive Memorandum 2000-15**" dated October 10, 2000.

4) Electric strikes

Electric strikes proposed for installation on interior doors are required to be submitted to this office and receive satisfactory review prior to installation. Electric strikes proposed for installation on exterior doors that allow free egress in accordance with NFPA 101 will be permitted to be installed without submittal to this office for review. Note that NFPA 80 requires electric strikes to be listed and labeled where used on fire rated door assemblies.

5) Magnetic Lock Releasing Devices

These locking system types are addressed in this office's "Interpretive Memorandum 2006-04". These locking systems are required to be submitted to this office and receive satisfactory review prior to installation.

In accordance with R.S. 40:1574, new construction, repairs, remodeling, additions, and renovations to a building requires the submittal of plans and specifications to this office for review, and found to satisfactorily comply, prior to the work being performed. The addition of special locking arrangements falls into the definition of renovation. The following information is required to be submitted anytime that special locking devices are proposed to be installed in

buildings other than One- or Two- Family Dwellings. A satisfactory review must be performed by this office prior to any installation of special locking hardware.

INSTRUCTIONS for SUBMITTAL of SPECIAL LOCKING ARRANGEMENTS to this office

- 1) The latest "SPECIAL LOCKING ARRANGEMENTS REQUEST FOR INSTALLATION" form issued by this office should be used, without modification. This form contains all information required to comply with the requirements of this office and may be obtained from our website at http://www.dps.state.la.us/sfm. The form must be completed in its entirety. Please note that the occupancy classification identified shall correspond to the requirements of NFPA 101. Also note that the requirements outlined in the "New" occupancy chapters are used to determine compliance for each new installation.
- 2) Both the firm and employee names and license numbers issued by this office for the Locking System Contractor must be indicated. If a Statewide Electrical Contractor is identified, a copy of the license is required with the submittal.
- 3) If the Locking System Contractor is also licensed with this office as a Fire Alarm System Contractor AND will be making the connection to the fire alarm system, identify both the locking and fire alarm license numbers for the firm and for the employee(s) in the space provided. If the connection of the special locking system to the fire alarm system is to be made by another contractor, indicate that this is to be submitted separately for review by the licensed fire alarm contractor.
- 4) If the building is protected by an automatic sprinkler system, and a fire alarm system does not exist, provide documentation to indicate that connection of the special locking system to the automatic sprinkler system, (water flow), will be submitted to this office separately for review by a licensed Sprinkler System Contractor.
- 5) A floor plan of the building in sufficient detail to evaluate the impact of the locked doors on exit access from the building is required. Note that a plan limited to the area immediately surrounding the door to be locked is typically insufficient. Indicate the location(s) of the door(s) to be locked and the side of the door on which the devices are located. Floor plans of the upper floors of a building are required where the exit doors serving those floors are indicated to be locked, (i.e. stair enclosure doors).
- 6) Manufacturer's specification sheets for each required device must be submitted. The devices must be listed for use with the intended locking system.
 - a) Where "push bars", "touch sense bars", or other similar hardware is provided on rated exit enclosure doors, in lieu of the required sensors for Access-Controlled Egress Doors, the device must be listed as "Fire Exit Door Hardware" in addition to "Releasing Devices". Provide the listing(s) from a recognized testing agency for the device.
 - b) Delayed egress locking system components must be listed for use with delayed egress systems. Provide the listing(s) from a recognized testing agency for the device.
- 7) A complete and accurate description of the locking system is required. Compliance with ALL applicable requirements of NFPA 101, IM 2006-04, and/or IM 2000-15 as applicable, is required.
- 8) Indicate door sizes if magnetic locks are to be mounted to the underside of the door frame header or on the side of the jamb. Locks or devices that project into the required means of egress are NOT PERMITTED.
 - a) NFPA 101, IBC, and ADA-AG require projections in a means of egress to be not less than 6'-8" nominal above the finished floor.
 - b) NFPA 101, IBC, and ADA-AG require a minimum of 32" clear unobstructed width.
- 9) Furnish the necessary review fees. Submittals may be mailed (or faxed) to the Plan Review Section of State Fire Marshal's office for review. An invoice for the review charges will be mailed to licensed contractors from the

State Fire Marshal's office. (NOTE: AVOID DOUBLE OR DUPLICATE BILLING. Either mail OR fax the submittal package – DO NOT DO BOTH).

Please note that the "Request for Exemption" submittals are intended for the expedited review of no more than ten (10) locking locations, entailing any combination of Access Control, Delayed Egress, or Special Health Care locking conditions. If more than ten (10) locking locations are proposed, a full plan review application and fee may be required to be submitted for review, at the discretion of the Plan Reviewer, based on the extent and complexity of the conditions proposed.

Include with submittals any additional information relevant to the project, such as appeal determinations, inspection citations, or correspondence related to the proposed scope of work. A delay in the review process can be expected if this supplemental information is not furnished.

HHF/DZ/LJD